

# Robbins Geller Rudman & Dowd LLP

Boca Raton	Melville	San Diego
Chicago	Nashville	San Francisco
Manhattan	Philadelphia	Washington, D.C.

Eric I. Niehaus  
[erien@rgrdlaw.com](mailto:erien@rgrdlaw.com)

September 23, 2022

VIA ECF

Honorable Frederic Block  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

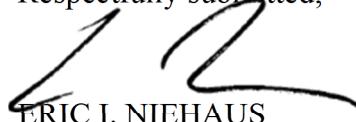
Re: *In re Infinity Q Diversified Alpha Fund and Infinity Q Volatility Alpha Fund, L.P. Securities Litigation*, No. 1:21-cv-1047-FB-MMH (E.D.N.Y.)

Dear Judge Block:

We represent Lead Plaintiff Schiavi + Company LLC DBA Schiavi + Dattani and plaintiff Dominus Multimanager Fund, Ltd. (collectively, "Plaintiffs") in the above-referenced matter and write on behalf of all parties to inform the Court that Plaintiffs have reached a global settlement with all defendants in this action, including the Moving Defendants identified in the pre-motion letter filed on August 5, 2022 (ECF 72), for up to \$48 million in cash consideration. On September 7, 2022, the parties to the state action and this federal action jointly filed an amended stipulation of settlement in the first filed case, *In re Infinity Q Diversified Alpha Fund Securities Litig.*, Index No. 651295/2021 (N.Y. Sup. Ct.), in New York Supreme Court and are seeking preliminary approval of a global settlement that will resolve all claims in all actions. *See Ex. A* (September 7, 2022 stipulation of settlement), attached hereto. Justice Borrok has scheduled a hearing for preliminary approval of the settlement in the state action for October 17, 2022. *See Ex. B* (September 21, 2022 Order to Show Cause (Borrok, J.)), attached hereto.

We are next scheduled to appear before Your Honor for a pre-motion conference on October 13, 2022.

Respectfully submitted,



ERIC I. NIEHAUS

EIN:sll  
Attachments

cc: All counsel of record (via ECF)